

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LOCAL 731 I.B. OF T. EXCAVATORS)	Civil Action No. 1:09-cv-00799-MMB
AND PAVERS PENSION TRUST FUND,)	
PRIVATE SCAVENGER AND GARAGE)	<u>CLASS ACTION</u>
ATTENDANTS PENSION TRUST FUND)	
AND TEXTILE MAINTENANCE AND)	
LAUNDRY CRAFT PENSION FUND,)	
Individually and on Behalf of All Others)	
Similarly Situated,)	
)	
Plaintiff,)	
)	
vs.)	
)	
DAVID C. SWANSON, et al.,)	
)	
Defendants.)	
)	
_____)	

UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT

Lead Plaintiff Zhengxu “John” He hereby moves pursuant to Fed. R. Civ. P. 23 for an Order: (i) preliminarily approving the terms of the Settlement as set forth in the Stipulation of Settlement, dated as of February 14, 2012 (“Stipulation”), filed contemporaneously herewith; (ii) certifying a Settlement Class consisting of all Persons who purchased R.H. Donnelley Corporation common stock between October 26, 2006 and May 29, 2009, inclusive; (iii) approving the form and method for providing notice of the Settlement to the Settlement Class; and (iv) scheduling a final approval hearing at which the Court will consider the request for approval of (a) the Settlement set forth in the Stipulation, (b) the Plan of Allocation of settlement proceeds among Settlement Class Members, and (c) Lead Counsel’s application for an award of attorneys’ fees and expenses.

The grounds for this motion are set forth in Lead Plaintiff’s Brief in Support of Unopposed Motion for Preliminary Approval of Settlement, which is filed contemporaneously herewith.

DATED: February 17, 2012

ROSENTHAL, MONHAIT & GODDESS, P.A.

/s/ P. Bradford deLeeuw

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